

**IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF VIRGINIA
Richmond Division**

KAREN WHITE,

Plaintiff,

v.

CIVIL ACTION NO. 3:12cv00115

BMW OF NORTH AMERICA, LLC.,

Defendant

PLAINTIFF'S OBJECTIONS TO DEFENDANT'S DESIGNATION OF WITNESSES

COMES NOW, the Plaintiff, KAREN WHITE, by counsel, and objects to Defendant's Designation of Witnesses as follows:

5. James Lewis –Customer Service Advisor, Casey BMW. **Plaintiff's objects to Defendant's designation pursuant to Rule 37(c)(1) as Defendant has not timely disclosed prospective witness in accordance with Rule 26(a)(1) and Rule 26(e).**

6. Michael Kline – Customer Service Advisor, Casey BMW. **Plaintiff's objects to Defendant's designation pursuant to Rule 37(c)(1) as Defendant has not timely disclosed prospective witness in accordance with Rule 26(a)(1) and Rule 26(e).**

7. Parties to this action; employees, agents and servants of parties to this action; Plaintiff's expert, Defendant's expert; persons named in Answers to Interrogatories; persons named in documents produced by various parties to this action. **Plaintiff objects to Defendant's designation pursuant to Rule 37(c)(1) as Defendant has not timely disclosed prospective witness in accordance with Rule 26(a)(1) and Rule 26(e).**

Respectfully submitted,
KAREN WHITE,

/s/

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CERTIFICATE OF SERVICE

I hereby certify that on this 12th day of September, 2012, I will file the foregoing motion electronically using the CM/ECF system, which will then send a notification of such filing (NEF) to the following:

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